

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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GEORGE IVERSON, Individually,

Plaintiff,

v.

COPLEY PLAZA 2001, LLC, a Delaware  
Limited Liability Company,

Defendant.

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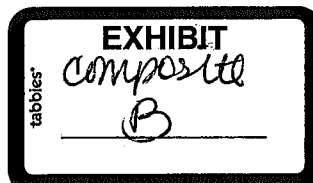
CIVIL ACTION NO.  
1:04-CV-12076-JLT

**PLAINTIFFS' REQUESTS FOR PRODUCTION**

**DATED:** March 18, 2005

Plaintiffs, by and through their undersigned counsel, and pursuant to the applicable Federal Rules of Civil Procedure, request that Defendant produce, within the time allowed by said Rules, at the offices of the undersigned, the following documents:

1. A copy of the Deed evidencing title to the property referenced in the Complaint or any Agreement evidencing legal title for use, including any Lease Agreements.
2. Articles of Incorporation for the Defendant and/or a copy of any Partnership Agreement evidencing any limited or general partnership status.
3. Any and all documentation on lease or tenant occupancy agreements between Defendant and all persons or entities presently renting, leasing or otherwise operating at the subject property.
4. Any and all documentation evidencing alterations, modifications, remodeling or renovation to the building or facility by or on behalf of the Defendant or any predecessor any time after January 26, 1992 including but not limited to plans, designs, blueprints, contracts for construction and like documentation.



5. Any and all documentation evidencing any design or construction of facilities by or on behalf of the Defendant for first occupancy later than thirty (30) months after July 26, 1990, including but not limited to plans, designs, blueprints, contracts for construction, and like documentation.
6. All applications for building permits pulled by or on behalf of the Defendant in this action for the property referenced in the Complaint.
7. All blueprints, site plans, and other architectural renderings for the property in the possession, custody or control of the Defendant, showing the number and location of any stores, rooms, entrances, pathways, bathrooms and parking spaces as applicable to the property.
8. Any and all reports, memoranda, documentation, or other writings from 1990 to the present concerning compliance with the Americans With Disabilities Act.
9. Any and all documentation which the Defendant contends evidences that they are a private club or establishment or a religious organization or entity exempted from the coverage under Title II of the Civil Rights Act of 1964.
10. Any and all documentation in the possession or control of the Defendant evidencing written policies or procedures for the Defendant's premises referred to in the Complaint that are in effect, to afford all offered goods, services, facilities, privileges, advantages or accommodations to individuals with disabilities.
11. Any and all documentation in the possession or control of the Defendant evidencing auxiliary aids and services for the Defendant's premises referred to in the Complaint including receipts to purchase same.

12. Any and all documents evidencing the number of employees of the Defendant for the years 1992 through the present, including but not limited to, unemployment compensation tax returns, employee ledgers, and other documentation. (You may list the number of employees for each year in lieu of these records.)
13. A copy of any Corporate Income Tax Returns or Partnership Tax Returns or Individual Tax Return for the last three (3) years for the Defendant.
14. Financial Statements (annual statements only) of the Defendant for the years 1992 through the present.
15. That the Defendant permit Plaintiff to enter the Defendant's premises for the purpose of inspecting and measuring, surveying, photographing, and testing the Defendant's property for purposes of documenting the Defendant's compliance or lack thereof with Title III of the American's With Disabilities Act.


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was e-mailed on March

18, 2005, to:

Laurence Donoghue, Esq.  
Morgan Brown & Joy, LLP  
200 State Street, 11th Floor  
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By:   
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Oliver Wragg, Esq. (BBO #643152)  
Of Counsel  
Counsel for Plaintiff